

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AKHMED GADZHIEVICH BILALOV, an individual,

Plaintiff,

Docket #: 20-Civ-09153(AT)(KNF)

- against-

HERMAN GREF, SBERBANK CIB USA, INC.

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Irina Shpigel, executed on June 4, 2021, Plaintiff Ahmed Bilalov (“Plaintiff”), by and through his undersigned attorneys, will move this Court, at the Courthouse located at 40 Foley Square, New York, New York, at a date and time to be determined by this Court, for an order pursuant to Federal Rule of Civil of Procedure (“FRCP”) 15(a)(2) for leave to amend the complaint.

PLEASE TAKE FURTHER NOTICE that Plaintiff is amenable to a return date convenient for the Court and is willing to discuss with Defendants a briefing schedule acceptable to the parties in place of the 14-day period for opposition papers, and 7-day period for reply papers, that would otherwise apply under FRCP 6(c) and Rule 6.1(b) of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York.

Dated: New York, New York
June 4, 2021

/s/Irina Shpigel

Irina Shpigel

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